

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Aaron Abadi,

Plaintiffs,

-against-

American Airlines Group, Inc., *et al.*,

Defendant.

X

: Case No.: 1:23-cv-04033-LJL

: **DECLARATION OF SAMI SARELIUS  
IN SUPPORT OF FINNAIR OYJ'S  
MOTION TO DISMISS**

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I, Sami Sarelius, hereby declare and state as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration.

2. I am the General Counsel of Finnair OYJ ("Finnair") with a business address of Tietotie 9, 01530 Vantaa, Finland, and have been employed in this position since February 1, 2007.

3. My duties and responsibilities include the legal affairs of Finnair Oyj.

4. I submit this Declaration in support of Finnair's Motion to Dismiss.

5. I am familiar with the facts and allegations contained in Plaintiff's Complaint and Supplemental Complaint and submit this Declaration based upon my personal knowledge and/or my review of the records of Finnair that are created and maintained in the regular course of its business.

6. Finnair is a corporation organized and existing under the laws of Finland engaged in the business of the carriage by air of passengers, baggage and cargo.

7. Finnair is majority-owned by the government of Finland.

8. Finnair maintains its headquarters and principal place of business in Vantaa, Finland.

9. Finnair has never maintained a principal place of business in any state in the United States, including New York or Texas.

10. Exhibit 45 of the Plaintiff's Complaint is a September 3, 2021 e-mail from Finnair Medadesk to Aaron Abadi.

11. At all times relevant to the Complaint and Supplemental Complaint, the office for Finnair's Medadesk was, and currently is, located in Finland.

12. According to Finnair's records, Aaron Abadi did not:

- a) make a reservation for travel on a Finnair flight between September 2021 and the present;
- b) enter into or purchase a contract of carriage for travel on a Finnair flight between September 2021 and the present; and
- c) did not travel on any Finnair flight between September 2021 and the present.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on 15 November 2023



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Sami Sarelius